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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re  
LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

Chapter 11  
Case No. 08-13555 (JMP)

**MEMORANDUM IN RESPONSE TO DEBTORS' THIRTY-EIGHTH  
OMNIBUS OBJECTION TO CLAIMS (AMENDED AND SUPERSEDED CLAIMS)  
BY EMAD MORRAR  
Claims Number 31342 and 36804**

EMAD MORRAR, by and through his attorneys Watson, Farley & Williams (New York) LLP, submits the following in response to Debtors' Thirty-Eighth Omnibus Objection to Claims (Amended and Superseded Claims) (the "Objection).

Creditor Emad Morrar ("Morrar") filed claim number 31342 on September 22, 2009, for deferred compensation in the form of stock and options granted to Morrar as a former employee of the Debtors, with a claim in the amount of \$12,500,000. At that time, only limited documents in support of his claim were available to Morrar. After Morrar received additional supporting documents, he filed claim number 36804 on October 7, 2009, which also was for deferred compensation in the form of stock and options granted to Morrar as a former employee of the Debtors. Morrar did not include a dollar figure for the amount of his claim on claim number 36804. Morrar was not represented by counsel at the

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time of filing either claim number 31342 or claim number 36804.

Claim number 36804 contained additional information that Morrar wished to submit to supplement claim number 31342. In Paragraph 1 of claim number 36804, Morrar noted, “(See previous claim). Additional documents.” Morrar also noted in Paragraph 8 of claim number 36804, “Documents attached for previous claim.” Claim number 36804 should not be treated as a separate and distinct claim, but rather should be treated as a supplement to claim number 31342, as intended by Morrar.

Claim number 31342 contains information that is not listed on claim number 36804, including the dollar amount of the claim and a declaration that the claim is for deferred compensation. It is clear from the notations on claim number 36804, and the additional information contained in claim number 31342, that Morrar intended claim number 36804 to supplement claim number 31342, not to duplicate it or to supersede it.

Any reply to this response is to be returned to Watson, Farley & Williams (New York) LLP at the address indicated below. The person possessing ultimate authority to reconcile, settle or otherwise resolve this claim is Emad Morrar, with an address at 12 Stormont Road, London N64NL, U.K., and with a telephone number of 011 44 7899 067 893.

Emad Morrar respectfully requests this Court to not disallow and expunge claim number 31342, but to treat claim number 36804 as supplementing claim number 31342.

Dated: October 18, 2010  
New York, New York

WATSON, FARLEY & WILLIAMS (NEW YORK) LLP

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